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SOLID WASTE ASSOCIATION
of North America

CALIFORNIA CHAPTERS

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April 6, 2006

Bill Brattain,
California Regional Water Quality Control Board
Central Valley Region, Sacramento Office
11020 Sun Center Dr #200
Rancho Cordova, CA 95670-6114

Subject: Comments Regarding Draft General Waste Discharge Requirements and Monitoring and Reporting Program for Discharges of Green Waste for Composting Within the Central Valley Region

Dear Mr. Brattain:

The Solid Waste Association of North America (SWANA) is composed of approximately 7000 public and private sector solid waste management professionals throughout North America dedicated to the development and enhancement of environmentally and economically sound practices and policies for the integrated management of municipal solid waste. There are approximately 900 members of SWANA in California, and on their behalf I am writing to express concerns regarding the proposed requirements for Monitoring and Reporting Program for Discharges of Green Waste for Composting within the Central Valley Region.

California jurisdictions are under pressure to meet recycling mandates and composting operations are a significant component of jurisdictions efforts to meet those mandates. This proposal would significantly impair existing facilities and discourage future facilities from being developed due to the excessive requirements.

Although the proposal was circulated to a number of regulatory agencies, there was not sufficient circulation to the potentially regulated community and there was no known public forum to discuss this proposal. Specifically SWANA is concerned regarding the following issues:

- The proposed design and monitoring requirements are excessive since there was insufficient data presented on problems with existing green waste operations
- The requirements would require revision to other site permits potentially including Conditional Use Permits, CEQA documents, and solid waste permits. These approvals can take several years to obtain. Thus the timeline for securing this approval is unrealistic.
- The definitions in Attachment A are inconsistent with those adopted by the California Integrated Waste Management Board after several years of debate by all interested parties. This inconsistency creates regulatory confusion when proposers are considering siting composting facilities.
- It is unclear how the proposed requirements will impact stockpiles of segregated green materials located at solid waste facilities and stockpiles of woody materials collected (slash) from local mandated fire clearing activities.
- Although the proposed requirements do allow for an "equivalent or better" engineered alternative, we believe that a performance demonstration, based on site specific characteristics, that the operation as proposed would not adversely impact groundwater [similar to the liner performance demonstrations] should be added. The "equivalent or better" standard infers that the permeability of the pad would be the

performance standard for the alternative. There are many situations where groundwater is deep and it could be demonstrated that the prescriptive impermeable pad standard is not required.

- The Central Valley Regional Water Quality Control Board's should provide specific data on known environmental impacts from green waste composting activities.

For these reasons, the California Chapters of SWANA urge you to delay processing this proposal until workshops can be held throughout the region and input incorporated into a revised proposal.

Sincerely,



Yvette Gomez Agredano
Legislative Advocate
SWANA, California Chapters

cc: Frances McChesney, Office of Chief Counsel, SWRCB, Sacramento
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